

Pat Shaw-Allen - NOAA Federal

From: Pat Shaw-Allen - NOAA Federal
Sent: Wednesday, May 13, 2020 9:24 AM
To: Jennifer Moore - NOAA Federal
Cc: Lisamarie Carrubba - NOAA Federal
Subject: Re: Question on CAA permits

Hello Jennifer

Sorry it took so long for me to respond. While I do not have experience with atmospheric emissions, I suppose it is time for me to apply what I learned in environmental fate and chemistry class. First, If the windrose analysis Felix did is consistent with insignificant exposures where our species occur, then I generally would concur. Copying Lee for her perspective.

However, the "operational flexibility with an annual emissions cap" worries me. Theoretically emissions that occur in a short burst, creating an acute exposure for any species that happen to be within the airshed. Until EPA sends more info, we really do not know what we are dealing with. The POM and any pollutants adhered to it would enter the water, otherwise VOCs are generally dispersed into the atmosphere. SOX and NOX contribute to acid rain and in the atmosphere, VOCs are eventually degraded.

I can try to help out if/when you get more info

Pat

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On Fri, May 8, 2020 at 11:04 AM Jennifer Moore - NOAA Federal <jennifer.moore@noaa.gov> wrote:

Hello Pat,

I hope you are doing as well as possible in these crazy times. I am reaching out because we have recently begun a conversation with EPA Region 2 on a Clean Air Act permit they are drafting for the HOVENSA/Limetree Bay Refinery in St Croix. During public comment on the draft permit, they were advised they needed ESA Sec 7 consultation. The attached document is the concurrence letter they received from USFWS.

I have no experience with CAA permit consultations. The EPA staff are modelers and have no experience with Sec 7, so we don't make a very good team for this project. I am hoping perhaps you have

some experience? Or know who might? We (Melissa cc'd is my colleague and she completed the Biological Opinion on the USACE permit for the in-water construction associated with reopening the plant) advised EPA that they need to make a determination as to whether or not the activity may affect our species. We brainstormed 2 possible routes of effects: 1) inhalation of the plume by our air-breathing species and 2) effects related to dissolution of the emission constituents into water. However, we have no experience with these constituents and their ability to dissolve, what concentrations may be experienced, and what might rise to an adverse effect. So we are looking for guidance.

EPA will be sending us more information about the extent of the emissions plume and concentrations.

Any help that you can provide would be greatly appreciated.

Cheers,
Jennifer

----- Forwarded message -----

From: **Colecchia, Annamaria** <Colecchia.Annamaria@epa.gov>

Date: Thu, Apr 30, 2020 at 10:36 AM

Subject: RE: Request to talk

To: Jennifer Moore - NOAA Federal <jennifer.moore@noaa.gov>

Cc: Sareen, Neha <sareen.neha@epa.gov>, Siegel, Joseph <Siegel.Joseph@epa.gov>

Thanks, Jennifer.

We are not available tomorrow but are available next Thursday, May 7th. Times could be 10:00, 11:00, 1:00 or 3:00pm. Please let us know which you prefer and we can set up a call.

As background, we are working on a response to public comments for an air permit in St. Croix, USVI. It is for a restart of a refinery that shut down in 2012. We consulted with the US Fish and Wildlife regarding the ESA but found that we also need to consult with Marine Fisheries. So this is the purpose of the call. The letter with the FWS is attached as fyi.

Thanks for your help.

Annamaria

(212) 637- 4016

p.s. Neha and I are air modelers. We may have Joe Siegel is our legal counsel working on the responses present as well so that we understand the process.

From: Jennifer Moore - NOAA Federal <jennifer.moore@noaa.gov>
Sent: Thursday, April 30, 2020 9:19 AM
To: Colecchia, Annamaria <Colecchia.Annamaria@epa.gov>
Cc: Sareen, Neha <sareen.neha@epa.gov>
Subject: Re: Request to talk

Hello Annamaria,

I would be happy to discuss your project with you and then likely put you in contact with someone from the Interagency Cooperation Branch within my office. I am the ESA Coral Recovery coordinator and do not conduct very many consultations, but I am familiar with the process and should be able to point you in the right direction. I am available tomorrow afternoon after 12:30 EDT. If that doesn't work, we will need to wait until next Thursday as I am in all-day meetings M-W.

Cheers,

Jennifer

On Wed, Apr 29, 2020 at 12:12 PM Colecchia, Annamaria <Colecchia.Annamaria@epa.gov> wrote:

Hello Jennifer,

We are writing to you to find information regarding an Endangered Species Act requirement. Neha Sareen and I are with the Environmental Protection Agency and we are working on an air permit project in St.Croix, US Virgin Islands. We received your name from the US Fish and Wildlife Service for that area, Jose Burgos-Cruz. Are you the correct contact?

Annamaria Colecchia

(212) 637-4016

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Jennifer Moore

Protected Coral Recovery Coordinator

NOAA Fisheries Southeast Regional Office

727-551-5797 (office) 727-647-2357 (cell)

jennifer.moore@noaa.gov

****New Website:** www.fisheries.noaa.gov/corals

To those who sacrificed careers of adventure in the wide-open spaces to wrestle for conservation in the policy arena.

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Jennifer Moore

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